

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1(b)

HILL WALLACK LLP

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In Re:

Karine G. Peterside aka Karine Peterside,

Debtor.

Case No.: 23-10374 (CMG)

Chapter: 13

Judge: Christine M. Gravelle, U.S.B.J.

Hearing Date: March 15, 2023 at 9:00 a.m.

**NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

To: Jeanne A. Naughton, Clerk
402 East State Street
Trenton, NJ 08608

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650
Trustee

John M. McDonnell, Esq.
McDonnell Crowley, LLC
115 Maple Avenue
Red Bank, NJ 07701
Debtor's Attorney

Karine G. Peterside aka Karine Peterside
14 Mountain Court
Millstone, NJ 08510
Debtor

Chamberlain Peterside
14 Mountain Court
Millstone, NJ 08510
Co-Debtor

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346
Secured Creditor

Xcellon Capital Advisors Limited
c/o Chamberlain S. Peterside, CEO
14 Mountainview Court
Millstone, New Jersey 08510
Secured Creditor

PLEASE TAKE NOTICE, that on March 15, 2023 at 9:00 a.m., or as soon thereafter as counsel may be heard, Hill Wallack LLP, attorneys for secured creditor, U.S. Asset Funding, LP (“Movant”), shall move before the Honorable Christine M. Gravelle, U.S.B.J. at the United States Bankruptcy Court, 402 East State Street, Courtroom #3, Trenton, New Jersey 08608 for an Order granting Movant relief from the automatic stay with respect to the debtor, Karine G. Peterside aka Karine Peterside (“Debtor”) pursuant to Section 362(d)(1) of the Bankruptcy Code and relief from co-debtor stay with respect to co-debtor, Chamberlain Peterside (“Co-Debtor”) pursuant to Section 1301(c) with respect to real property located at 14 Mountain Court, Millstone, NJ 08510; and

PLEASE TAKE FURTHER NOTICE, that Movant shall rely upon the Certification of Creditor, including a Certification Regarding Calculation of Amount Due (Note and Mortgage) in support of its Motion; and

PLEASE TAKE FURTHER NOTICE, that in accordance with LBR 9013-1(a) and LBR 9013-4, a proposed form of Order is submitted herewith and in accordance with LBR 9013-3(d), this motion will be decided on the papers unless opposition is filed.

HILL WALLACK LLP
Attorneys for Movant

By: /s/ Mark A. Roney
Mark A. Roney

Dated: February 21, 2023